Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO

massDOT
Massachusetts Department of Transportation

February 8, 2022

Mr. Martin Suuberg
Commissioner
Department of Environmental Protection
1 Winter Street
Boston, MA 02108

Dear Commissioner Suuberg:

Pursuant to Section 7 of amended 31 CMR 7.36, *Transit System Improvements,* please find enclosed our responses to public comments on the 2021 Status Report on transit projects required under the revised State Implementation Plan (submitted to the Department of Environmental Protection (DEP) on August 18, 2021). Section 7 requires the Massachusetts Department of Transportation to file a summary of all public comments and written responses to those comments within 120 days of the public meeting also required by Section 7. A public meeting was held by DEP on October 25, 2021.

The 2021 Status Report is publicly available on the MassDOT website at www.massdot.state.ma.us/SIP.

If you have any questions or concerns, or if we can be of further assistance, please do not hesitate to contact me at (857) 368-8865 or david.mohler@state.ma.us.

Sincerely,

David Mohler
Executive Director
Office of Transportation Planning

cc: Glen Keith, Department of Environmental Protection

Ten Park Plaza, Suite 4160, Boston, MA 02116
Tel: 857-368-4636, TTY: 857-368-0655
www.mass.gov/massdot

Charles D. Baker, Governor
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massDOT
Massachusetts Department of Transportation

State Implementation Plan – Transit Commitments
2021 Status Report
Agency Response to Public Comments

I. MassDOT Certification

II. List of Public Comments Received

III. Agency Responses to Public Comments

IV. 2021 Status Report

V. Public Comments
- **a. Emails and Letters**

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COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS DEPARTMENT OF TRANSPORTATION
OFFICE OF TRANSPORTATION PLANNING

MEMORANDUM

TO:	Martin Suuberg Commissioner Department of Environmental Protection
FROM:	David J. Mohler Executive Director MassDOT Office of Transportation Planning
DATE:	February 8, 2022
RE:	310 CMR 7.36 (7)(c)

This memo is intended to fulfill the reporting requirements of 310 CMR 7.36 (7)(c), in which the Massachusetts Department of Transportation must attest that:

- MassDOT has provided complete information for all requirements of 310 CMR 7.36 (7)(a).
- MassDOT has provided complete information about any actual or known potential need and reasons for a project substitution pursuant to 310 CMR 7.36(4)(b).
- MassDOT has provided complete information on the interim offset projects implemented or proposed to be implemented pursuant to 310 CMR 7.36(4)(b) and (5)(g)4.

I certify that all the information listed above has been provided and that MassDOT has, to the best of its ability, fulfilled all public processes and reporting requirements described in 310 CMR 7.36 (7).

David J. Mohler
Executive Director
MassDOT Office of Transportation Planning

Comments Received on the MassDOT 2021 Status Report (by format and date)

Written Testimony					
Date	**Title**	**First Name**	**Last Name**	**Affiliation**	**Additional Authors**
11/5/2021		Ken	Krause		

Oral Testimony					
Date	**Title**	**First Name**	**Last Name**	**Affiliation**	**Additional Authors**

Note: MassDOT did not receive comments via oral testimony on the 2021 Status Report.

Massachusetts Department of Transportation
Massachusetts Bay Transportation Authority

State Implementation Plan – Transit Commitments
2021 Status Report
Agency Response to Public Comments

Submitted to the
Massachusetts Department of Environmental Protection

February 8, 2022

For questions on this document, please contact:
Massachusetts Department of Transportation
Office of Transportation Planning
10 Park Plaza, Room 4150
Boston, Massachusetts 02116 planning@dot.state.ma.us

INTRODUCTION

This document summarizes and responds to public comments received by the Massachusetts Department of Transportation (MassDOT) on the *State Implementation Plan-Transit Commitments 2021 Status Report* (the Status Report) submitted to the Massachusetts Department of Environmental Protection (DEP) on August 18, 2021 in order to fulfill the requirements of 310 CMR 7.36, *Transit System Improvements.* The Status Report detailed the status of one public transit project – listed below – required of MassDOT under 310 CMR 7.36. The project is:

- Green Line Extension to Somerville and Medford

MassDOT accepted public comments on the Status Report through November 8, 2021, following a public meeting (held on October 25, 2021) at which MassDOT staff presented an overview of the contents of the Status Report, and provided an opportunity for members of the public to ask questions and provided feedback and comments. MassDOT did not receive any comments at the public meeting. One written comment was received during the public comment period following the public meeting.

Each year, MassDOT receives comments and questions in response to the Status Report that are similar to comments and questions received in past years. When that happens, MassDOT will often refer the commenter back to an earlier response or, if the issue has changed in a meaningful way, will clarify and update earlier responses as appropriate. MassDOT staff recognize that major decisions relating to the implementation of SIP projects do not, and likely cannot, satisfy all project advocates, and that decisions can and will continue to generate public controversy into the future, even when MassDOT considers an issue to be resolved. MassDOT will continue to respond to questions and concerns as they come up.

Throughout this document, the SIP regulation (310 CMR 7.36) is referenced. Additional information and detail on the regulation (310 CMR 7.36) can be viewed at:

http://www.massdot.state.ma.us/SIP

I. GREEN LINE EXTENSION TO SOMERVILLE AND MEDFORD

1. *MassDEP should instruct MassDOT to accurately describe the reprogramming of the funds in all SIP documents, including the 2021 Status Report, as well as report on the status of the unfinished GLX Phase II Environmental Impact Study that is to be completed as a condition of the 2016 MPO action that allowed progress to continue on the SIP Transit Commitment GLX Phase I.*

In the 2018 SIP Response to Comments, MassDOT clarified in response to a similar comment that, in 2016, the Boston Regional Metropolitan Planning Organization reprogrammed funds that were initially intended to construct an additional extension of the Green Line to Route 16 in order to help close a funding gap in the budget for the core Green Line Extension project. MassDOT is again clarifying this point in this document. Additionally, reporting on the status of the environmental impact review for an additional extension of the Green Line to Route 16 is not a requirement of 310 CMR 7.36 (7)(c).

Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO

massDOT
Massachusetts Department of Transportation

August 18, 2021

Mr. Martin Suuberg
Commissioner
Department of Environmental Protection
1 Winter Street
Boston, MA 02108

Dear Commissioner Suuberg:

The Massachusetts Department of Transportation (MassDOT), in conjunction with the Massachusetts Bay Transportation Authority (MBTA), is submitting the attached report to the Department of Environmental Protection (DEP) in order to fulfill the requirements of 310 CMR 7.36, *Transit System Improvements*. This Annual Report provides a project description and status information for each of the outstanding public transit projects required under the amended State Implementation Plan (SIP).

Please do not hesitate to contact me at (857) 368-8865 if you would like to discuss further.

Sincerely,

David J. Mohler
Executive Director
MassDOT Office of Transportation Planning

cc: Christine Kirby, Department of Environmental Protection

Ten Park Plaza, Suite, 4150, Boston, MA 02116
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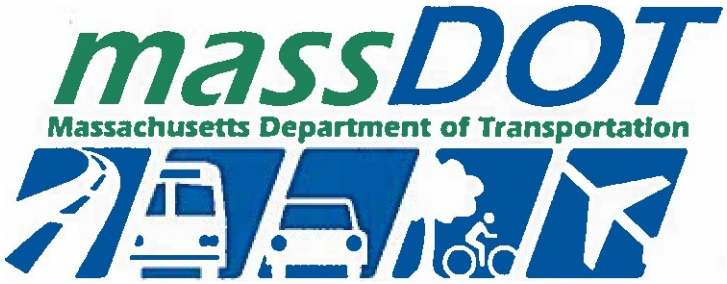

Massachusetts Department of Transportation

Massachusetts Bay Transportation Authority

State Implementation Plan – Transit Commitments

2021 Status Report

Submitted to the
Massachusetts Department of Environmental Protection

August 18, 2021

For questions on this document, please contact:

Massachusetts Department of Transportation

Office of Transportation Planning

10 Park Plaza, Boston, Massachusetts 02116

planning@dot.state.ma.us

INTRODUCTON

This report is submitted by the Massachusetts Department of Transportation (MassDOT), in conjunction with the Massachusetts Bay Transportation Authority (MBTA), to the Massachusetts Department of Environmental Protection (DEP) in order to fulfill the requirements of 310 CMR 7.36(7), *Transit System Improvements*. Below is a project description and status information for each of the outstanding public transit projects required under the amended State Implementation Plan (SIP).

As noted in previous Status Reports, MassDOT is no longer reporting on the Red Line/Blue Line Connector Design, Blue Line Platform Lengthening and Station Modernization, the Greenbush Commuter Rail Restoration, the Construction of 1,000 Parking Spaces, and the Fairmount Line Improvement Project. All of those projects have been completed and MassDOT believes that the relevant commitments have been met. On December 8, 2015, the Environmental Protection Agency published a final rule in the Federal Register approving a revision submitted by the Commonwealth of Massachusetts to remove from the SIP the commitment to design the Red Line/Blue LineConnector project.

As always, MassDOT hopes to make the annual Status Report process one of iterative improvement, and looks to DEP and to the public for comments and other suggestions to refine its efforts.

This report (along with past reports and supporting documents) will be posted to MassDOT's SIP Regulations website at:

https://www.massdot.state.ma.us/planning/Main/PlanningProcess/StateImplementationPlan/SIPTransitCommitmentSubmissions.aspx

I. GREEN LINE EXTENSION TO SOMERVILLE AND MEDFORD

SIP Requirement

Before December 31, 2021, construction of the following facilities shall be completed and opened to full public use: 1. The Green Line Extension Medford Branch from Lechmere Station to College Ave Station; 2. The Green Line Extension Union Square Branch from Lechmere Station to Union Sq. Station;

- ✓ *On or before 18 months following the effective date of the regulation (December 1, 2006), MassDOT must develop a request for proposals for a design consultant, complete the competitive procurement process, and issue a notice to proceed.*
  - ✓ Done

- ✓ *Within 15 months of the completion of the above requirements, MassDOT must complete conceptual design and file an Environmental Notification Form.*
  - ✓ Done

- ✓ *On or before two years after MEPA's issuance of a scope for a Draft Environmental Impact Report or a Single Environmental Impact Report, MassDOT must complete preliminary design and file a DEIR or SEIR.*
  - ✓ Done

- ✓ *On or before one year after MEPA's issuance of a scope for a Final Environmental Impact Report, MassDOT must file an FEIR.*
  - ✓ Done

- ✓ *On or before 18 months after MEPA's issuance of a certificate on an FEIR or an SEIR, MassDOT must complete final design, apply for all necessary permits, funds and grants, file any required legislation, and initiate all public and private land acquisition.*
  - ✓ Done

- ✓ *Upon completion of all of the above milestones, DEP and MassDOT shall establish a schedule for project construction and deadlines for project completion.*
  - ✓ Done

Extensive information about the Green Line Extension project can be found at www.mass.gov/greenlineextension.

Project Description

The Green Line Extension project is a 4.7-mile light rail line, which will extend the current Green Line service from a relocated Lechmere Station in East Cambridge, Massachusetts, to a terminus at College Avenue in Medford, Massachusetts and a spur to Union Square in Somerville, Massachusetts. This project is moving forward with a new cost estimate of $2.289 billion. Funding is in place, including a combined $1.99 billion in federal and state funds and pledged contributions totaling approximately $296 million from the Cities of Cambridge and Somerville ($75 million), the Boston Region Metropolitan Planning Organization ($157.1 million), and MassDOT ($64.3 million through Special Obligation Bonds).

In early 2017, the MBTA initiated a procurement process for a Design-Build (DB) entity to design and construct the project. In November 2017, Board approval was received to execute a Design-Build contract with GLX Constructors. The notice to proceed under the contract was issued in December 2017. The Federal Transit Administration obligated an initial tranche ($100 million) of Capital Investment Grant funds for the project in December 2017, under the 2015 Full Funding Grant Agreement (FFGA). Additional funds have since followed.

The contract with GLX Constructors is in the amount of $999.7 million.

The primary goals of the Project are to improve corridor mobility, boost transit ridership, improve regional air quality, ensure equitable distribution of transit services, and support opportunities for sustainable development in Cambridge, Somerville, and Medford. This project comprises light rail service on two new branches extending from Lechmere Station in Cambridge to Union Square Station in Somerville and College Avenue Station in Medford, together with a Vehicle Maintenance Facility ("VMF") and a multiuse path.

Planning Conformity

Throughout the life of the project, the Green Line Extension project has been included in all relevant transportation planning documents, including the Regional Transportation Plans of the Boston Region Metropolitan Planning Organization (MPO).

Project Schedule

Early Works Activities – Keolis / Railroad Operations

Three 'early action' tasks began in 2017 in order to have some of the early track, drainage, retaining wall, and signal work activities completed prior to the start of heavy construction. This work was completed as of Fall 2018.

Overall Project Baseline Schedule

Milestones for project completion have been established and made part of the Design Build contract. The milestones have been incorporated into that contract. By establishing these milestones, MassDOT has met the sixth and final interim milestone found in the SIP regulation. ("Upon completion of all of the above milestones, DEP and MassDOT shall establish a schedule for project construction and deadlines for project completion."). The schedule, as of June 21, 2021, is as follows:

- Revenue Service on Branch 1 (Union Square Brand) will begin in December 2021
- Revenue Service on Branch 2 (Medford Branch) will begin in May 2022

SIP Requirement Status

By filing an Expanded Environmental Notification Form, procuring multiple design consultants, and publishing both Draft and Final Environmental Impact Reports, MassDOT has met the first four interim milestones associated with the Green Line Extension project. MassDOT – which has committed substantial resources to the Green Line Extension project, a top transportation priority of the Commonwealth and the largest expansion of the MBTA rapid transit system in decades – has transitioned the project from the planning and environmental review phases to design, engineering, and construction, coupled with the tasks associated with programming federal funding.

In the 2011 SIP Status Report, MassDOT reported that the Green Line Extension project would not meet the legal deadline of December 31, 2014.

The timeline for overall project completion represents a substantial delay beyond the SIP deadline of December 31, 2014, triggering the need to provide interim emission reduction offset projects and measures for the period of the delay (beginning January 1, 2015). Working with the Central Transportation Planning Staff, MassDOT and the MBTA calculated the reductions of NMHC, CO, and NOx – reductions equal to or greater than the reductions projected for the Green Line Extension itself, as specified in the SIP regulation – that are required for the period of the delay.

In June 2012, MassDOT released a list of potential mitigation ideas received from the public that could be used as offset measures. In the summer and fall of 2012, MassDOT solicited public comments on these potential measures. The MBTA created an internal working group to determine a final portfolio of interim mitigation measures to implement by December 31, 2014, the legal deadline for the implementation of the Green Line Extension.

This work resulted in a recommendation to implement the following three interim mitigation measures, which collectively would meet the emissions reduction target for the project:

- Additional off-peak service along existing routes serving the corridor, including the Green Line, and bus routes 80, 88, 91, 94 and 96;
- Purchase of 142 new hybrid electric vehicles for The RIDE;

- Additional park and ride spaces at the Salem and Beverly intermodal facilities.

The Petition to Delay was submitted to the Massachusetts Department of Environmental Protection (DEP) on July 22, 2014, and expanded further on the analysis and determination of the interim offset measures. In a letter dated July 16, 2015, the DEP conditionally approved MassDOT's request to delay the Green Line Extension project and the implementation of the above interim mitigation measures. Both the 2014 Petition to Delay and the July 2015 Conditional Approval are available on MassDOT's website. Interim offset measures remain in place for as long as is necessary.

State Implementation Plan Public Meeting
Massachusetts Department of Environmental Protection and
the Massachusetts Department of Transportation
October 25, 2021 – 2:00 PM to 3:00 PM
October 25, 2021 – 5:00 PM to 6:00 PM
These meetings were held virtually.

Attendees at Sessions:

Glen Keith, Director, Air & Climate Programs Division, Massachusetts Department of Environmental Protection (MassDEP)
Steve Woelfel, Deputy Executive Director, Office of Transportation Planning, Massachusetts Department of Transportation (MassDOT)

Introduction

Moderator Glen Keith opened the meeting on MassDOT's 2021 Status Report on the State Implementation Plan (SIP) and provided background on the overall regulatory context of the SIP and the public process requirements.

MassDOT's Status Report for 2021 on the SIP was submitted to MassDEP on August 18, 2021, pursuant to the public process requirements of subsection (7) of 310 CMR 7.36, the *Transit System Improvements* regulation. Revisions to this regulation were effective December 2006. The U.S. Environmental Protection Agency (EPA) approved the revised regulation as a revision to the Massachusetts SIP in July 2008.

Under subsection (7) of 310 CMR 7.36, MassDOT is required to submit a Status Report annually on all uncompleted SIP requirements and submit that report to MassDEP. MassDEP is then required to hold a public meeting and take public comments. Within 120 days of this meeting, MassDOT is required to summarize and respond to all comments. Within 60 days of MassDOT's submission and response to comments, MassDEP is required to determine whether the public process requirements of the regulation have been met.

2021 Status Report[1]

Steve Woelfel, Deputy Executive Director, Office of Transportation Planning, MassDOT, provided a summary of the status of the two outstanding SIP commitments:

Green Line Extension Project

MassDOT awarded a contract to a Design Build team in December 2017. MassDOT expects to have revenue service for the main branch open in May 2022 and revenue service for the Union Square branch in March 2022, with final program completion later that year. Since 2014, MassDOT has implemented interim offset measures. These measures are: additional off-peak service on existing routes serving the corridor (the Green Line, bus

[1] Status up to date as of October 1, 2020, the date of the State Implementation Plan public meeting.

route 80, 88, 91, 94, and 96); purchasing 142 hybrid electric vehicles for the RIDE; and constructing additional Park and Rides at the Beverly and Salem intermodal facilities.

Oral Testimony – Afternoon Session

No citizens submitted testimony in the afternoon session.

Oral Testimony – Evening Session

No citizens submitted testimony in the evening session.

Ken Krause

50 Mystic Street Medford, MA 02155
781-874-0920 kenneth.krause@comcast.net

November 5, 2021

Caroline Vanasse
MassDOT, Office of Transportation Planning
Room 4150, Ten Park Plaza
Boston, MA 02116
caroline.vanasse@dot.state.ma.us

Erin Bostwick
MassDEP, Bureau of Air and Waste
One Winter Street
Boston, MA 02108
erin.bostwick@mass.gov

Dear Ms. Vanasse and Ms. Bostwick,

This letter is in response to the request for public comments on the 2021 Status Report for State Implementation Plan – Transit Commitments, submitted by the Massachusetts Department of Transportation (MassDOT) and the Massachusetts Bay Transportation Authority to the Massachusetts Department of Environmental Protection (MassDEP) on August 18, 2021.

I request that MassDEP reject the Status Report as inadequate and insufficient, because despite stating it would do so, MassDOT continues to exclude from the Status Report any reference to the reprogramming in 2016 of funds for Phase II of the Green Line Extension (GLX) to GLX Phase I, and its associated conditions.

While GLX Phase II — a .9-mile extension from the Medford/Tufts Station to a proposed station at Mystic Valley Parkway (Route 16) and Boston Avenue on the Medford/Somerville border — is not part of the Transit Commitments, it is very much attached to them: the $158 million that MassDOT petitioned the Boston Region Metropolitan Planning Organization (MPO) to reprogram from GLX Phase II to GLX Phase I was essential to MassDOT being able to continue construction on GLX Phase I and, thus, continue to make progress on its SIP commitment.

Additionally, the MPO's vote to reprogram this money stipulated that MassDOT continue to advance the environmental impact review of GLX Phase II. The process was promptly started in 2017, with MassDOT filing a Notice of Project Change and receiving a scope for an Environmental Impact Study from the Executive Office of Environmental Affairs, but it has since stalled and the EIS remains undelivered.

Both the fact that GLX Phase II money was reprogrammed to keep alive GLX Phase I, and the status of the GLX Phase II environmental impact review, should be part of the annual SIP Status Report. In fact, MassDOT stated it would comply with the former, but continues to not do so.

In response to SIP Status Report public comment letters as far back as 2018, the agency stated: "MassDOT now makes it clear in all SIP documents that, in 2016, the Boston Regional Metropolitan Planning Organization reprogrammed funds that were initially intended to construct an additional extension of the Green Line to Route 16 in order to help close a funding gap in the budget for the core Green Line Extension project."

Yet for the fourth consecutive year, the 2021 Status Report makes no mention of GLX Phase II, nor that the money originally programmed for GLX Phase II was reprogrammed to close the funding gap for GLX Phase I.

MassDEP should instruct MassDOT to accurately describe the reprogramming of the funds in all SIP documents, including the 2021 Status Report, as well as report on the status of the unfinished GLX Phase II Environmental Impact Study that is to be completed as a condition of the 2016 MPO action that allowed progress to continue on the SIP Transit Commitment GLX Phase I.

Thank you for your consideration.

Sincerely,

Ken Krause
50 Mystic St.
Medford, MA 02155
781-874-0920